

MULTIPLE SPECIES CONSERVATION PROGRAM CONFORMANCE STATEMENT
For PDS2016-MUP-16-018
Lyons Valley SD0701
APN 599-110-47-00

March 29, 2018

I. Introduction

The project proposes to construct an unmanned wireless telecommunication facility, including 12 antennas mounted in an antenna stealth structure (mono-pine), an enclosed equipment area on a hilltop, five utility poles, and approximately 544 feet of trenching within an existing dirt road. Proposed underground trenching for power and telecommunication (telco) lines will follow existing dirt access road areas to connect the proposed electrical transformer and meter with the existing power and telco provisions within the developed, Lyons Valley Road right-of-way (ROW). From the transformer and meter location, power and telco will be provided via proposed overhead lines, including four utility poles placed in disturbed areas. An additional, short reach of underground trenching within existing dirt access road areas will be required to provide power and telco from the furthest north utility pole to the proposed equipment and antenna location. No fuel modification is required for this wireless telecommunications facility. Permanent and temporary impact areas will be restricted to disturbed and developed land. No off-site impacts will occur as a result of the project.

The survey area consists of an existing dirt road with adjacent undeveloped and disturbed areas. The surrounding landscape is generally undeveloped with scattered residences. The project site occurs within the adopted South County Multiple Species Conservation Program (MSCP) Subarea Plan. The project is within designated Pre-Approved Mitigation Area (PAMA) lands. The project parcel qualifies as a Biological Resource Core Area (BRCA) because it is located within PAMA, is within a core linkage area (Otay Mountain/Jamul Mountains to Sequan Peak Linkage), and has been identified as having high habitat value. The site is also part of the MSCP Preserve target area.

A general biological survey and basic wetland delineation of the survey area was conducted by biologist Katie Bellon of HELIX Environmental in May 2016. The area surveyed extended beyond the project boundary (including infrastructure locations and trenching).

Four vegetation communities/habitat types occur in the survey area, including oak woodland, southern mixed chaparral, disturbed habitat, and urban/developed. The impacted area occurs entirely within the legally disturbed urban/disturbed footprint, which was completed in association with a permitted single-family mobile home.

Table 1
IMPACT TO VEGETATION COMMUNITIES/HABITAT TYPES

Vegetation Communities/ Habitat Types	Existing (acres ¹)	Impacts (acres ¹)	Mitigation		
			Ratio ²	Required	Provided Off-Site
Tier I					
Oak Woodland (71100)	0.6	0.00	2:1	0.00	0.00
Tier III					
Southern Mixed Chaparral (37120)	6.6	0.00	1:1	0.00	0.00
Tier IV					
Disturbed Habitat (11300)	1.9	0.16	--	--	0.0
Urban/developed (12000)	<0.1 (0.01)	0.01	--	--	0.0
TOTAL		0.17	--	0.0	0.0

¹ Totals reflect rounding.

² Assumes mitigation site meets criteria for BRCA. Oak woodlands would be mitigated at a 3:1 ratio and southern mixed chaparral would be mitigated at a 1.5:1 ratio if the mitigation site does not meet the criteria for BRCA.

One special status plant species was observed in the survey area: Engelmann oak (*Quercus engelmannii*), which is a County List D and CNPS Rank 4.2 plant species. One additional special status plant species known to the region is considered to have a high potential to occur within the survey area based on the presence of suitable conditions (Attachment C): felt-leaved monardella (*Monardella hypoleuca* ssp. *lanata*), which is a County List A, CNPS Rank 1B.2 species, and a critical population according to Attachment C of the Biological Mitigation Ordinance (BMO). The project has been designed to occur within the existing developed/disturbed footprint. Therefore, none of these species are likely to occur within the project site itself due to lack of suitable habitat. An avoidance measure has been included to avoid potential impacts to Engelmann oak within the 50-foot root zone buffer. In order to ensure that impacts are restricted to the existing developed footprint and inadvertent impacts to sensitive vegetation communities are avoided, the project is conditioned to install temporary fencing for all ground disturbance activities and to include biological monitoring. With these avoidance measures in place, impacts to sensitive habitat communities and plants are not expected to occur.

No special status animal species were observed or detected in the survey area. Four special status animal species known to the region are considered to have a moderate to high potential to occur in the study area based on the presence of suitable conditions (Attachment D). Two are County Group 1 animal species: Rufous-crowned sparrow (*Aimophila ruficeps canescens*) and Bell's sage sparrow (*Artemisiopiza belli belli*). Three are County Group 2 animal species: San Diego horned lizard (*Phrynosoma blainvillii*), red-diamond rattlesnake (*Crotalus ruber*), and coastal rosy boa (*Charina trivirgata roseofusca*). The project will occur within the developed/disturbed footprint. Therefore, none of these species are likely to occur within the project site itself due to lack of suitable habitat. In order to mitigate for potential indirect impacts to nesting birds, the project will

implement breeding season avoidance measures (See Biological Resources Letter Report for AT&T SD0701 Jamul Telecommunications Project, dated March 2BIO-2 and BIO-3). This measure, combined with temporary fencing and biological monitoring, will avoid impacts to sensitive wildlife species.

No raptors were observed near the survey area during the 2016 biological survey. Common raptors, such as red-tailed hawk (*Buteo jamaicensis*), could potentially forage over the study area; however, the potential is very low due to density of vegetation, rugged terrain, and poor lines of sight, and overall lack of evidence of foraging potential. Regardless, the project has been conditioned to include breeding season avoidance to prevent inadvertent impacts to nesting avian species.

The survey area is characterized entirely by uplands that lack evidence of potential jurisdictional waters and wetlands. No potential wetland conditions, drainage features, or riparian habitat occur within the survey area. Therefore, there are no resources subject to regulatory jurisdiction of the U.S./State and/or County Resource Protection Ordinance.

The survey area occurs within the Otay Mountain/Jamul Mountains to Sequan Peak Linkage and within PAMA of the Metro-Lakeside-Jamul Segment of the County's MSCP Subarea Plan. The Tier I oak woodlands and Tier III southern mixed chaparral within the survey area meets the criteria for RPO Sensitive Habitat Lands given the project site's location within the linkage area. The survey area and vicinity are semi-developed and wildlife is expected to travel relatively unobstructed through the local area. Wildlife movement is expected to follow traditional travel routes, such as ridgelines, valleys, and drainage features. The study area is situated on a relatively steep hillside, with a dirt access road that terminates at the top of a knoll; as such, wildlife will not be expected to select the study area as a travel route or movement path. The project has been designed to occur within the existing developed/disturbed footprint. Therefore, the project is not anticipated to have a significant impact on wildlife movement.

The findings contained within this document are based on County records and the Biological Resources Letter Report by Karl Osmundson of HELIX Environmental dated March 21, 2018. The information contained within these Findings is correct to the best of staff's knowledge at the time the findings were completed. Any subsequent environmental review completed due to changes in the proposed project or changes in circumstance shall need to have new findings completed based on the environmental conditions at that time.

The project has been found to conform to the County's Multiple Species Conservation Program (MSCP) Subarea Plan, the Biological Mitigation Ordinance (BMO) and the Implementation Agreement between the County of San Diego, the CA Department of Fish and Wildlife and the US Fish and Wildlife Service. Third Party Beneficiary Status and the associated take authorization for incidental impacts to sensitive species (pursuant to the County's Section 10 Permit under the Endangered Species Act) shall be conveyed only after the project has been approved by the County, these MSCP Findings are adopted by the hearing body and all MSCP-related conditions placed on the project have been satisfied.

II. Biological Resource Core Area Determination

The impact area and the mitigation site shall be evaluated to determine if either or both sites qualify as a Biological Resource Core Area (BRCA) pursuant to the BMO, Section 86.506(a)(1).

A. Report the factual determination as to whether the proposed Impact Area qualifies as a BRCA. The Impact Area shall refer only to that area within which project-related disturbance is proposed, including any on and/or off-site impacts.

The Impact Area qualifies as a BRCA because it meets the following BRCA criteria: (i) located within PAMA, (iii) part of a regional linkage/corridor, and (iv) contains very high or high habitat and links significant blocks of habitat.

i. The land is shown as Pre-Approved Mitigation Area on the wildlife agencies' Pre-Approved Mitigation Area map.

The project site occurs within unincorporated land in the Metro-Lakeside-Jamul Segment of the South County Multiple Species Conservation Program (MSCP) Subarea Plan, within Pre-Approved Mitigation Area (PAMA). Therefore, the project meets this criteria as a BRCA.

ii. The land is located within an area of habitat that contains biological resources that support or contribute to the long-term survival of sensitive species and is adjacent or contiguous to preserved habitat that is within the Pre-Approved Mitigation Area on the wildlife agencies' Pre-Approved Mitigation Area map.

The project has been specifically designed to ensure project impacts are limited to developed and disturbed habitat. Therefore, no sensitive species are likely to occur within the project site and the project site does not contain habitat that contributes to the long-term survival of sensitive species. Therefore, the project does not meet this criteria as a BRCA.

iii. The land is part of a regional linkage/corridor. A regional linkage/corridor is either:

- a. Land that contains topography that serves to allow for the movement of all sizes of wildlife, including large animals on a regional scale; and contains adequate vegetation cover providing visual continuity so as to encourage the use of the corridor by wildlife; or**
- b. Land that has been identified as the primary linkage/corridor between the northern and southern regional populations of the California gnatcatcher in the population viability analysis for the California gnatcatcher, MSCP Resource Document Volume II, Appendix A-7 (Attachment I of the BMO.)**

The project is located within the Otay Mountain/Jamul Mountains to Sequan Peak Linkage and is located within PAMA. Therefore, the project meets this criteria as a BRCA. The project has been designed to occur entirely within the existing disturbed/developed footprint. In addition, temporary fencing and biological monitoring is a condition of the project. Therefore, impacts to sensitive habitat communities and plants is not expected to occur.

- iv. The land is shown on the Habitat Evaluation Map (Attachment J to the BMO) as very high or high and links significant blocks of habitat, except that land which is isolated or links small, isolated patches of habitat and land that has been affected by existing development to create adverse edge effects shall not qualify as BRCA.**

The proposed project is located within an area considered to have high and very high habitat value according to the Habitat Evaluation Model and the project is located within a linkage identified as connecting Otay Mountain/Jamul Mountains to Sequan Peak areas. The project is within a MSCP Preserve target area. Therefore, the project meets the criteria as a BRCA. The project has been designed to occur entirely within the existing disturbed/developed footprint. In addition, temporary fencing and biological monitoring is a condition of the project. Therefore, impacts to sensitive habitat communities and plants is not expected to occur.

- v. The land consists of or is within a block of habitat greater than 500 acres in area of diverse and undisturbed habitat that contributes to the conservation of sensitive species.**

Although the project is located within the Otay Mountain/Jamul Mountains to Sequan Peak Linkage, the project is not a part of a core wildlife area and the project is not within undisturbed habitat. Therefore, the project does not meet this criteria as a BRCA.

- vi. The land contains a high number of sensitive species and is adjacent or contiguous to surrounding undisturbed habitats, or contains soil derived from the following geologic formations which are known to support sensitive species:**
- a. Gabbroic rock;**
 - b. Metavolcanic rock;**
 - c. Clay;**
 - d. Coastal sandstone**

The proposed project does not contain a high number of sensitive species, is not contiguous with undisturbed habitats and does not contain soils known to support sensitive species. The project has been specifically designed to ensure project impacts are limited to developed and disturbed habitat. Therefore, the project does not meet the criteria as a BRCA.

B. Report the factual determination as to whether the Mitigation Site qualifies as a BRCA.

The project site itself occurs entirely within the footprint of existing disturbed and developed land. Therefore no habitat mitigation is required.

III. Biological Mitigation Ordinance Findings

A. Project Design Criteria (Section 86.505(a))

The following findings in support of Project Design Criteria, including Attachments G and H (if applicable), must be completed for all projects that propose impacts to Critical Populations of Sensitive Plant Species (Attachment C), Significant Populations of Narrow Endemic Animal Species (Attachment D), Narrow Endemic Plant Species (Attachment E) or Sensitive Plants (San Diego County Rare Plant List) or proposes impacts within a Biological Resource Core Area (BRCA).

The project site is located within a BRCA and PAMA, is within a core linkage area (Otay Mountain/Jamul Mountains to Sequan Peak Linkage), and has been identified as an MSCP Preserve target area. However, the project has been designed to occur entirely within the existing disturbed/developed footprint. The project is conditioned with temporary fencing and biological monitoring to prevent inadvertent impacts to nearby sensitive habitats. Therefore, the project will not disturb sensitive vegetation communities and will not have a significant impact on sensitive plant and wildlife species due to lack of suitable habitat within the development footprint.

1. Project development shall be sited in areas to minimize impact to habitat.

The project has been designed to occur entirely within the existing disturbed/developed footprint. As a result, the project site does not provide suitable habitat for sensitive species and will not disturb sensitive vegetation communities. Therefore, the project meets this criteria of minimizing impacts to habitat.

2. Clustering to the maximum extent permitted by County regulations shall be considered where necessary as a means of achieving avoidance.

The project has been designed to occur entirely within the existing disturbed/developed footprint. The project will not disturb sensitive vegetation communities and the project site does not provide suitable habitat for sensitive plant and wildlife species. Therefore, the project meets this criteria of clustering to the maximum extent possible.

- 3. Notwithstanding the requirements of the slope encroachment regulations contained within the Resource Protection Ordinance, effective October 10, 1991, projects shall be allowed to utilize design that may encroach into steep slopes to avoid impacts to habitat.**

The project has been designed to occur entirely within the existing disturbed/developed footprint. The project will not disturb sensitive vegetation communities and will not have a significant impact to sensitive species due to lack of suitable habitat. Therefore, encroachment into the slopes to avoid habitat impacts is not necessary. This project meets this criteria.

- 4. The County shall consider reduction in road standards to the maximum extent consistent with public safety considerations.**

The project has been designed to occur entirely within the existing disturbed/developed footprint. Although construction activities will occur within the existing road footprint (eg. trenching), the project does not propose to construct or change the footprint of existing roads. Therefore, this criteria is not applicable to this project.

- 5. Projects shall be required to comply with applicable design criteria in the County MSCP Subarea Plan, attached hereto as Attachment G (Preserve Design Criteria) and Attachment H (Design Criteria for Linkages and Corridors).**

See Section IV. Subarea Plan Findings.

Therefore, the project is in compliance with project design criteria, including minimizing impacts to habitat, clustering to achieve avoidance, meeting steep slope encroachment regulations, reducing road standards, and complying with Attachment G (Preserve Design Criteria) and Attachment H (Design Criteria for Linkages and Corridors). Therefore, discussion of the Project Design Criteria, including Attachment G and H are not required.

B. Preserve Design Criteria (Attachment G)

In order to ensure the overall goals for the conservation of critical core and linkage areas are met, the findings contained within Attachment G shall be required for all projects located within Pre-Approved Mitigation Areas or areas designated as Preserved as identified on the Subarea Plan Map.

- 1. Acknowledge the “no net loss” of wetlands standard that individual projects must meet to satisfy State and Federal wetland goals, policies, and standards, and implement applicable County ordinances with regard to wetland mitigation.**

The survey area is characterized entirely by uplands that lack evidence of potential jurisdictional waters and wetlands. No wetland conditions, drainage features, or riparian habitat were observed in the survey area. Therefore, there are no resources subject to the regulatory jurisdiction of the U.S./State or County. Therefore, the project will result in no impacts or loss of wetlands or jurisdictional waters.

2. Include measures to maximize the habitat structural diversity of conserved habitat areas, including conservation of unique habitats and habitat features.

The project has been specifically designed to ensure project impacts are limited to developed and disturbed footprint. The project will not remove or disturb vegetation within or near conserved habitat areas. Further, the project is conditioned with temporary fencing and biological monitoring to prevent inadvertent impacts to nearby sensitive habitats. Therefore, the project is in conformance with this criteria to maximize habitat structural diversity of conserved habitat areas.

3. Provide for the conservation of spatially representative examples of extensive patches of Coastal sage scrub and other habitat types that were ranked as having high and very high biological value by the MSCP habitat evaluation model.

The proposed project is located in an area modeled as having high habitat value according to the Habitat Evaluation Model. The project has been specifically designed to ensure project impacts are limited to developed and disturbed footprint in order to avoid impacts to habitats having high biological value. The project is conditioned with temporary fencing and biological monitoring to prevent inadvertent impacts to nearby sensitive habitats. Therefore, project is in conformance with this criteria to conserve coastal sage scrub and other habitat types having high and very high biological values.

4. Create significant blocks of habitat to reduce edge effects and maximize the ratio of surface area to the perimeter of conserved habitats. Subsequently, using criteria set out in Chapter 6, Section 6.2.3 of the MSCP Plan, potential impacts from new development on biological resources within the preserve that should be considered in the design of any project include access, non-native predators, non-native species, illumination, drain water (point source), urban runoff (non-point source) and noise.

The project is not located within a significant block of undisturbed habitat; however the project area qualifies as a BRCA, is located within PAMA, and is within a core linkage area (Otay Mountain/Jamul Mountains to Sequan Peak Linkage). The project has been designed to occur entirely within the existing disturbed/developed footprint and conditioned with temporary fencing and

biological monitoring to prevent inadvertent impacts to nearby sensitive habitats. Therefore, the project is in conformance with this criteria to provide for the creation of significant blocks of habitat.

5. Provide incentives for development in the least sensitive habitat areas.

The project has been specifically designed to ensure project impacts are limited to existing developed and disturbed footprint and conditioned with temporary fencing and biological monitoring to prevent inadvertent impacts to nearby sensitive habitats. Therefore, the project is in conformance with this criteria to develop within least sensitive habitat areas.

6. Minimize impacts to narrow endemic species and avoid impacts to core populations of narrow endemic species.

No narrow endemic species were detected or are expected to occur within the project site. Therefore, the project is in conformance with this criteria to minimize impacts to narrow endemic species.

7. Preserve the biological integrity of linkages between BRCAs.

The project will not substantially interfere with wildlife travel between blocks of habitat and will not potentially block or substantially interfere with a local or regional wildlife corridor or linkage. The survey area occurs within the Otay Mountain/Jamul Mountains to Sequan Peak Linkage and PAMA inside the Metro-Lakeside-Jamul Segment of the County's MSCP Subarea Plan. The proposed project is relatively small and located along the slope of a hill; therefore, it will not impact wildlife movement along this linkage area. Impacts are restricted to existing disturbed and developed areas, and as such, will not impede wildlife movement. Therefore the project is in conformance with this criteria to preserve the biological integrity of linkages between BRCAs.

8. Achieve the conservation goals for covered species and habitats (refer to Table 3-5 of the MSCP Plan).

No MSCP covered plant or wildlife species were detected during field surveys and no covered plant species are expected to occur on site. Two covered wildlife species have high potential to occur on-site: Rufous-crowned sparrow (*Aimophila ruficeps canescens*), San Diego horned lizard (*Phrynosoma blainvillii*). However, the project has been specifically designed to occur within the existing developed and disturbed footprint. No sensitive species are likely to occur within the project's development footprint due to lack of suitable habitat. The project has been conditioned with breeding season avoidance, temporary fencing, and biological monitoring to prevent inadvertent impacts to nearby sensitive species and habitats. Therefore, the project is in conformance with this criteria to support the conservation goals for covered species and habitats.

C. Design Criteria for Linkages and Corridors (Attachment H)

For project sites located within a regional linkage and/or that support one or more potential local corridors, the following findings shall be required to protect the biological value of these resources:

1. Habitat linkages as defined by the BMO, rather than just corridors, will be maintained.

The project site is within the Otay Mountain/Jamul Mountains to Sequan Peak Linkage, a core linkage area. The project has been designed to occur entirely within the existing disturbed/developed footprint. The survey area and vicinity are semi-developed and wildlife is expected to travel relatively unobstructed through the local area. Wildlife movement is expected to follow traditional travel routes, such as ridgelines, valleys, and drainage features. The study area is situated on a relatively steep hillside, with a dirt access road that terminates at the top of a knoll; as such, wildlife will not be expected to select the study area as a travel route or movement path. Therefore the project is in conformance with this criteria to maintain habitat linkages.

2. Corridors with good vegetative and/or topographic cover will be protected.

The project has been specifically designed to ensure project impacts are limited to existing developed and disturbed footprint. The project will not impact sensitive habitat communities and will minimize any potential impacts to individual plants. The project has been conditioned with temporary fencing, biological monitoring, and oak tree monitoring to prevent inadvertent impacts to nearby sensitive species and habitats. Therefore, the project is in conformance with this criteria to protect existing vegetation and topographic cover.

3. Regional linkages that accommodate travel for a wide range of wildlife species, especially those linkages that support resident populations of wildlife, will be selected.

The project will not substantially interfere with wildlife travel between blocks of habitat and will not potentially block or substantially interfere with a local or regional wildlife corridor or linkage. The survey area occurs within the Otay Mountain/Jamul Mountains to Sequan Peak Linkage and PAMA inside the Metro-Lakeside-Jamul Segment of the County's MSCP Subarea Plan. The proposed project is relatively small and located along the slope of a hill; therefore, it will not impact wildlife movement along this linkage area. Impacts are restricted to existing disturbed and developed areas, and as such, impacts to biological resources are not expected to occur. Therefore the project is in conformance with this criteria to accommodate travel for a wide range of wildlife species.

- 4. The width of a linkage will be based on the biological information for the target species, the quality of the habitat within and adjacent to the corridor, topography, and adjacent land uses. Where there is limited topographic relief, the corridor must be well vegetated and adequately buffered from adjacent development.**

The survey area occurs within the Otay Mountain/Jamul Mountains to Sequan Peak Linkage and PAMA inside the Metro-Lakeside-Jamul Segment of the County's MSCP Subarea Plan. The proposed project includes a 12-antenna mono-broadleaf, an enclosed equipment area, a transformer, a meter, four utility poles, and approximately 544 feet of trenching. The project impacts are limited and restricted to existing disturbed and developed areas. The project will not substantially impede wildlife movement and will not further constrain the existing corridors and linkages in the local area, including the Otay Mountain/Jamul Mountains to Sequan Peak Linkage. Wildlife is expected to travel relatively unobstructed through the local area. The project does not create a significant constraint on the width of the linkage than currently exists. Therefore the project is in conformance with this criteria to maintain the linkage width.

- 5. If a corridor is relatively long, it must be wide enough for animals to hide in during the day. Generally, wide linkages are better than narrow ones. If narrow corridors are unavoidable, they should be relatively short. If the minimum width of a corridor is 400 feet, it should be no longer than 500 feet. A width of greater than 1,000 feet is recommended for large mammals and birds. Corridors for bobcats, deer, and other large animals should reach rim-to-rim along drainages, especially if the topography is steep.**

The project does not create an artificial corridor for wildlife and movement functions will continue on the project site. Adequate space and connectivity of habitat will remain in the local area. The project area does not contain an existing corridor nor create a new corridor. Therefore the project is in conformance with this criteria to ensure adequate width for long corridors.

- 6. Visual continuity (i.e., long lines-of-site) will be provided within movement corridors. This makes it more likely that animals will keep moving through it. Developments along the rim of a canyon used as a corridor should be set back from the canyon rim and screened to minimize their visual impact.**

The small structure and utility poles proposed for the project will not impair visual continuity within any corridors or linkages that may be designated in the local area. Therefore the project is in conformance with this criteria to maintain visual continuity.

7. Corridors with low levels of human disturbance, especially at night, will be selected. This includes maintaining low noise levels and limiting artificial lighting.

The project does not occur within or create corridors. Further, the project consists of an unmanned wireless telecommunication facility and corresponding utility poles. Site lighting will be kept to the minimum required for safety and will be shielded to direct light downward. Lighting will also be controlled by a manual or timed switch and will not be used except when nighttime maintenance was necessary. A substantial increase in noise and nighttime lighting is not expected. No significant impact to wildlife corridors or linkages resulting from lighting or noise will occur. Therefore the project is in conformance with this criteria to maintain corridors with low levels of human disturbance.

8. Barriers, such as roads, will be minimized. Roads that cross corridors should have ten foot high fencing that channels wildlife to underpasses located away from interchanges. The length-to-width ratio for wildlife underpasses is less than 2, although this restriction can be relaxed for underpasses with a height of greater than 30 feet.

The project consists of an unmanned wireless telecommunication facility and corresponding utility poles. The project does not propose to construct any barriers to wildlife movement, including roads or permanent fencing. Therefore the project is in conformance with this criteria to minimize barriers.

9. Where possible at wildlife crossings, road bridges for vehicular traffic rather than tunnels for wildlife use will be employed. Box culverts will only be used when they can achieve the wildlife crossing/movement goals for a specific location. Crossings will be designed as follows: sound insulation materials will be provided; the substrate will be left in a natural condition, and vegetated with native vegetation if possible; a line-of-site to the other end will be provided; and if necessary, low-level illumination will be installed in the tunnel.

The project consists of an unmanned wireless telecommunication facility and corresponding utility poles. The project does not propose to construct any barriers to wildlife movement, including roads. Therefore this criteria is not applicable to this project.

10. If continuous corridors do not exist, archipelago (or stepping-stone) corridors may be used for short distances. For example, the gnatcatcher may use disjunct patches of sage scrub for dispersal if the distance involved is less than 1-2 miles.

The project is located within a continuous corridor and will not obstruct the value or function of wildlife connectivity, therefore archipelago corridors are not necessary. Therefore this criteria is not applicable to this project.

IV. Subarea Plan Findings

Conformance with the objectives of the County Subarea Plan is demonstrated by the following findings:

1. The project will not conflict with the no-net-loss-of-wetlands standard in satisfying State and Federal wetland goals and policies.

The survey area is characterized entirely by uplands that lack evidence of potential jurisdictional waters and wetlands. No wetland conditions, drainage features, or riparian habitat were observed in the survey area. Therefore, there are no resources subject to the regulatory jurisdiction of the U.S./State.

2. The project includes measures to maximize the habitat structural diversity of conserved habitat areas including conservation of unique habitats and habitat features.

The project has been specifically designed to ensure project impacts are limited to developed and disturbed footprint. The project will not remove or disturb vegetation within or near conserved habitat areas. The project is conditioned with temporary fencing and biological monitoring to prevent inadvertent impacts to nearby sensitive habitats. Therefore, the project is in conformance with this criteria to maximize habitat structural diversity of conserved habitat areas.

3. The project provides for conservation of spatially representative examples of extensive patches of Coastal sage scrub and other habitat types that were ranked as having high and very high biological values by the MSCP habitat evaluation model.

The proposed project is located in an area modeled as having high habitat value according to the Habitat Evaluation Model. The project has been specifically designed to ensure project impacts are limited to developed and disturbed footprint in order to avoid impacts to habitats having high biological value. The project is conditioned with temporary fencing and biological monitoring to prevent inadvertent impacts to nearby sensitive habitats. Therefore, project is in conformance with this criteria to conserve coastal sage scrub and other habitat types having high and very high biological values.

4. The project provides for the creation of significant blocks of habitat to reduce edge effects and maximize the ratio of surface area to the perimeter of conserved habitats.

The project area qualifies as a BRCA, is located within PAMA, and is within a core linkage area (Otay Mountain/Jamul Mountains to Sequan Peak Linkage); however, the project is not located within a significant block of undisturbed habitat. The project has been designed to occur entirely within the existing disturbed/developed footprint and conditioned with temporary fencing and biological monitoring to

prevent inadvertent impacts to nearby sensitive habitats. Therefore, the project is in conformance with this criteria to provide for the creation of significant blocks of habitat.

5. The project provides for the development of the least sensitive habitat areas.

The project has been specifically designed to ensure project impacts are limited to existing developed and disturbed footprint and conditioned with temporary fencing and biological monitoring to prevent inadvertent impacts to nearby sensitive habitats. Therefore, the project is in conformance with this criteria to develop within least sensitive habitat areas.

6. The project provides for the conservation of key regional populations of covered species, and representations of sensitive habitats and their geographic sub-associations in biologically functioning units.

No MSCP covered plant or wildlife species were detected during field surveys and no covered plant species are expected to occur on site. Two covered wildlife species have high potential to occur on site: Rufous-crowned sparrow (*Aimophila ruficeps canescens*), San Diego horned lizard (*Phrynosoma blainvillii*). However, the project has been specifically designed to occur within the existing developed and disturbed footprint. No sensitive species are likely to occur within the project's development footprint due to lack of suitable habitat. The project has been conditioned with breeding season avoidance, temporary fencing, and biological monitoring to prevent inadvertent impacts to nearby sensitive species and habitats. Therefore, the project is in conformance with this criteria to conserve key regional populations of covered species and associated sensitive habitats.

7. Conserves large interconnecting blocks of habitat that contribute to the preservation of wide-ranging species such as Mule deer, Golden eagle, and predators as appropriate. Special emphasis will be placed on conserving adequate foraging habitat near Golden eagle nest sites.

The project has been specifically designed to occur within the existing developed and disturbed footprint. Mule deer could use the existing roadways as a travel route, but will not be expected to use the areas for breeding or foraging. The study area does not support fallow or open areas with evidence of foraging potential. Due to the placement of the faux mono-pine and five utility poles, the project will not have an impact on large interconnecting blocks of habitat for mule deer or other species. No raptors were observed near the survey area during the 2016 biological survey. Common raptors, such as red-tailed hawk (*Buteo jamaicensis*), could potentially forage over the study area; however, the potential is very low due to density of vegetation, rugged terrain, poor lines of sight, and overall lack of evidence of foraging potential. The project will not impact sensitive habitat communities and breeding season avoidance has been included to prevent inadvertent impacts to nesting avian species. Therefore, with this avoidance measure in place, impacts on raptor foraging and nesting are not expected to occur. The nearest known historic

golden eagle nests are approximately 5.4 miles to the south and to the southeast. The survey area does not contain any cliffs for nesting habitat and it is not within a known golden eagle territory. The eagle foraging habitat in the survey area and surrounding area is poor and the distance from known eagle territories indicate that the site has low value for golden eagle. Therefore, no impacts will occur to golden eagle or its habitat. Therefore, the project is not expected to result in impacts to golden eagles, raptors, mule deer, other species, or their habitat. Therefore the project is in conformance with this criteria to conserve large blocks of habitat that contribute to preservation of wide-ranging species.

- 8. All projects within the San Diego County Subarea Plan shall conserve identified critical populations and narrow endemics to the levels specified in the Subarea Plan. These levels are generally no impact to the critical populations and no more than 20 percent loss of narrow endemics and specified rare and endangered plants.**

No narrow endemic species were detected or are expected to occur within the project site. One critical population, felt-leaved monardella (*Monardella hypoleuca* ssp. *lanata*), a County List A and CNPS Rank 1B.2 species, is considered to have high potential to occur within the project area based on the presence of suitable conditions (BMO, Attachment C). The project has been specifically designed to ensure project impacts are limited to existing developed and disturbed footprint. Impacts to felt-leaved monardella are not expected to occur, due to lack of suitable habitat. Therefore, the project is in conformance with this criteria to conserve critical populations and narrow endemics.

- 9. No project shall be approved which will jeopardize the possible or probable assembly of a preserve system within the Subarea Plan.**

The land is located within Pre-Approved Mitigation Area (PAMA), within an MSCP Preserve target, and within the Otay Mountain/Jamul Mountains to Sequan Peak Linkage. The project has been specifically designed to ensure project impacts are limited to existing developed and disturbed footprint. The project will not impact sensitive habitat communities. Therefore, the project is in conformance with this criteria to avoid development that jeopardizes the possible or probable assembly of the preserve system.

- 10. All projects that propose to count on-site preservation toward their mitigation responsibility must include provisions to reduce edge effects.**

The project has been specifically designed to ensure project impacts are limited to developed and disturbed habitat, and therefore, no habitat mitigation is required. The project is in conformance with this criteria.

- 11. Every effort has been made to avoid impacts to BRCAs, to sensitive resources, and to specific sensitive species as defined in the BMO.**

The project area qualifies as a BRCA, is located within PAMA, has been identified as an MSCP Preserve target area, and is within the Otay Mountain/Jamul Mountains to Sequan Peak Linkage. However, the project has been specifically designed to ensure project impacts are limited to the existing developed and disturbed footprint. The project is not expected to impede wildlife movement. No jurisdictional waters occur on the project site. No sensitive species are likely to occur within the project site itself due to lack of suitable habitat. Engelmann oak, a sensitive species, was detected within the survey area. The project will not remove any oak trees and trench routes have been sited within disturbed dirt access road areas and away from oak root protection zones to the maximum extent possible. The project has been conditioned with oak tree monitoring to minimize impacts. Therefore, the project is in conformance with this criteria to avoid impacts to BRCA, sensitive habitats, and sensitive species as defined by the BMO. The project is consistent with the goals of the MSCP.

Kimberly Smith, Planning & Development Services
March 29, 2018

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